

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHARLOTTE WINELAND, Individually, and  
SUSAN WINELAND, as Personal  
Representative of the Estate of JOHN DALE  
WINELAND, Deceased,

**Plaintiffs,**

V.

AIR & LIQUID SYSTEMS CORPORATION  
(sued *individually and as successor by merger to*  
BUFFALO PUMPS, INC.); *et al.*,

## Defendants.

## STIPULATION

Pursuant to LCR 7(d)(1) and LCR 10(g), and on behalf of all parties to this matter and their respective counsel, Plaintiffs Charlotte Wineland and Susan Wineland, and their counsel, together with Defendant Syd Carpenter, Marine Contractor, Inc., and their counsel, and after meeting and conferring and obtaining the agreement of all Parties, hereby stipulate that there is good cause to extend the deadline to disclose expert testimony under Fed. R. Civ. P. 26(a)(2), set forth in the Court's October 30, 2019, Amended Order Setting Trial Date & Related Dates.

The principal purpose of this stipulation is to give the parties additional time to obtain reports from expert witnesses and conduct their depositions. Discovery does not close until

STIPULATED MOTION AND [PROPOSED]  
ORDER TO EXTEND EXPERT DISCLOSURE  
DEADLINE - 1

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1 January 31, 2020, and there are still witnesses being deposed and documents being produced.  
2 Plaintiffs have been meeting and conferring with various Defendants regarding the scope of  
3 discovery, and have come to several agreements without needing the Court's intervention.  
4 However, the Parties need additional time to resolve issues before the completion of expert reports.  
5 Moreover, Plaintiffs and various Defendants are also actively engaged in settlement negotiations,  
6 and believe that an extension will help to facilitate settlement and allow any resolving parties to  
7 save on litigation costs.

8 The Parties propose extending the current expert witness disclosure and discovery  
9 deadlines as set forth below. The Parties do not believe that any other dates or deadlines need to  
10 be changed. By agreement and stipulation, all remaining Parties have agreed to these extensions.  
11 The agreement and stipulation by defendant Alfa Laval Inc. herein is made subject to and without  
12 waiving its objections that this Court lacks jurisdiction over it in this matter, as set forth in  
13 Defendant Alfa Laval Inc.'s Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. 10), which  
14 was filed herein on July 8, 2019, but which has not yet been ruled on by the Court.

15

16 **Reports from expert witnesses under FRCP 26(a)(2):**

17 Current date: December 13, 2019

18 Proposed date: January 15, 2020

19

20 **Expert Discovery Deadline**

21 Current date: January 31, 2020

22 Proposed date: February 14, 2020

23

24 DATED this 9th day of December, 2019.

25

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5 Andrew Seitz, CA #273165\*  
6 \**Admitted Pro Hac Vice*

7 **FOLEY & MANSFIELD, PLLP**

8 *s/ Diane C. Babbitt* \_\_\_\_\_

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23 *Attorneys for Plaintiffs*

## **ORDER**

Based on the foregoing Stipulation of the Parties, it is hereby ORDERED that the case deadlines in this matter shall be extended as set forth below:

## Reports from expert witnesses under FRCP 26(a)(2):

Old date: December 13, 2019

New date: January 15, 2020

## Expert Discovery Deadline

Old date: January 31, 2020

New date: February 14, 2020

DATED this 12<sup>th</sup> day of December, 2019.

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THE HONORABLE ROBERT S. LASNIK

Presented by:

/s/ Andrew Seitz 12/09/2019

*/s/ Christine Dinsdale 12/09/2019*

Plaintiff's Counsel Date

## Defendant Alfa Laval, Inc.

Signing subject to and without waiving its objections that the court lacks personal jurisdiction over Alfa Laval, Inc.

/s/ Ronald C. Gardner 12/09/2019

/s/ Lorianne Hanson 12/09/2019

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**Defendant Auburn Technology,  
Inc.**

Defendant Aurora Pump Company

/s/ J. Scott Wood 12/09/2019

/s/ Timothy K. Thorson 12/09/2019

Defendant Cla-Val Co.

Defendant Cleaver-Brooks, Inc.

/s/ *Claude Bosworth* 12/09/2019

/s/ Alice Serko 12/09/2019

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Defendant Curtiss-Wright Flow Control Corp.

Defendant Electrolux Home Products, Inc.

1      /s/ Claude Bosworth 12/09/2019  
2      Defendant Gardner Denver, Inc.

1      /s/ James E. Horne 12/09/2019  
2      Defendant IMO Industries, Inc.

3      /s/ Rachel Tallon Reynolds 12/09/2019  
4      Defendant Invensys Systems, Inc.

3      /s/ Kevin J. Craig 12/09/2019  
4      Defendant Milwaukee Valves Company, Inc.

5      /s/ Dana C. Kopij 12/09/2019  
6      Defendant The Nash Engineering  
7      Company

5      /s/ D. David Steele 12/09/2019  
6      Defendant Puget Sound Commerce Center, Inc.

8      /s/ Rachel Tallon Reynolds 12/09/2019  
9      Defendant RobertShaw Controls Co.,  
10     Flowserve US, Inc.

8      /s/ J. Scott Wood 12/09/2019  
9      Defendant Syd Carpenter, Marine Contractor, Inc.

11     /s/ Lorianne Hanson 12/09/2019  
12     Defendant Taco, Inc.

11     /s/ J. Scott Wood 12/09/2019  
12     Defendant Tate Andale, Inc.

13     /s/ Kevin J. Craig 12/09/2019  
14     Defendant Velan Valve Corporation,  
15     Air & Liquid Systems Corporation,  
16     Ingersoll-Rand Company

13     /s/ James D. Hicks 12/09/2019  
14     Defendant The Wm. Powell Company

17     /s/ Allen Eraut 12/09/2019  
18     Defendant Warren Pumps LLC

17     /s/ Chrsitine Dinsdale 12/09/2019  
18     Defendant BW/IP, Inc., Flowserve Corporation

19     /s/ G. William Shaw 12/09/2019  
20     Defendant Crane Co.

19     /s/ Christopher Marks 12/09/2019  
20     Defendant CBS Corporation, General Electric  
Company

21     /s/ Megan Uhle 12/09/2019  
22     Defendant Carrier Corp.

21     /s/ Jeffrey Odom 12/09/2019  
22     Defendant Anchor/Darling Valve Company